

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (ERIE)

IN RE:)	Bankruptcy Case No. 18-10804-TPA
)	
DEBRA A. ALEXANDER,)	Chapter 13
Debtor)	
)	Docket No.
DEBRA A. ALEXANDER,)	
Movant)	Related to Docket Nos. 47, 48, 56, 57, 58, 59,
)	61, and 63
v.)	
)	Hearing Date: April 29, 2020 at 12:00 PM
RONDA WINNECOUR,)	
CHAPTER 13 TRUSTEE, LSF8)	
MASTER PARTICIPATION)	
TRUST, CAPITAL ONE BANK,)	
Respondents)	

MOTION TO EXCUSE PERSONAL APPEARANCE OF JAY S. JUMP
PER ORDER TO SHOW CAUSE DATED MARCH 17, 2020

AND NOW, this 9th day of April, 2020, comes Jay S. Jump of BK Attorney Services, LLC (“Mr. Jump”), by and through his counsel, Knox McLaughlin Gornall & Sennett, P.C., stating as follows:

1. Mr. Jump is the President and CEO of BK Attorney Services, LLC d/b/a certificateofservice.com, and maintains a mailing address of PO Box 4590, Pasco, WA 99302 (509) 412-1356.

2. BK Attorney Services is an approved thirty party notice provider to the United States Courts since 2008 and mails bankruptcy notices and documents for over 3,800 law firms, panel trustees and Chapter 13 Trustees across the United States, including Trustees Natalie Cardiello, Esq. and Jeffrey Sikirica, Esq. here in the Western District of Pennsylvania. See letters by Trustees Cardiello and Sikirica attached hereto collectively as Exhibit A and incorporated herein by reference.

3. BK Attorney Services was hired by Atty. Nagurney to mail required bankruptcy notices on his behalf in the Alexander case.

4. BK Attorney Services served the Notice of Proposed Modification to Confirmed Plan dated September 21, 2018 et al on Atty. Nagurney's behalf and at his direction. BK Attorney Services provided Atty. Nagurney with a report of the service that was done on his behalf, which Atty. Nagurney filed with his own certificate of service at Document No. 58.

5. On or about March 17, 2020, this Court issued its Order to Show Cause which, among other things, required Mr. Jump to personally appear at a hearing on April 29, 2020.

6. Mr. Jump requests that he be excused from personally appearing and asks that he be allowed to participate by phone. The undersigned counsel will be participating on his behalf as well.

7. Requiring Mr. Jump to travel from Washington State to appear in person in Erie during this time of coronavirus would cause an extreme hardship and a risk to Mr. Jump's health and the health of all he encounters. In addition, it would be costly.

8. Mr. Jump and BK Attorney Services apologizes for any problems or concerns that may have inadvertently occurred. Mr. Jump and BK Attorney Services would welcome an opportunity to discuss the services they provide and any concerns that the Court may have.

9. Mr. Jump never intended to, and respectfully believes he did not, render legal services or participate in the unauthorized practice of law. Mr. Jump is a bankruptcy attorney with twenty (20) years of experience and admitted in good standing in Washington State. To the contrary, Mr. Jump only intended to provide outsourcing of mailing services to a sole practitioner debtor's attorney in order to alleviate the burden of mass mailings, as BK Attorney Services has done for literally thousands of law firms and trustees across the United States for over a decade.

WHEREFORE, Mr. Jump prays for an order allowing him to participate in the Order to Show Cause Hearing by telephone, and that Mr. Jump be granted such other and further relief as is necessary and just.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

Attorneys for Jay S. Jump

BY: /s/ Mark G. Claypool

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CERTIFICATE OF SERVICE

TO PARTIES IN INTEREST:

I, Mark G. Claypool, certify under penalty of perjury that I served the above-captioned pleading, on the parties at the addresses on the attached matrix, on April 9, 2020 by first class, United States mail, postage pre-paid.

The total number of parties served was 7.

EXECUTED ON: April 9, 2020

By: /s/ Mark G. Claypool
Mark G. Claypool, Esquire
PA I.D. No. 63199
Knox McLaughlin Gornall & Sennett, P.C.
120 West Tenth Street
Erie, Pennsylvania 16501-1461
(814) 459-2800

SERVICE MATRIX

Via US mail:

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Conneaut Lake, PA 16316

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Jay S. Jump
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Via CM/ECF

United States Trustee

ustpregion03.pi.ecf@usdoj.gov